

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION – DETROIT

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In re:	: Chapter 9
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CITY OF DETROIT, MICHIGAN,	: Case No.: 13-53846
	: .
Debtor.	: Hon. Steven W. Rhodes
	: .
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**LIST OF FACT WITNESSES OF INTERNATIONAL UNION, UAW**

The International Union, UAW (“UAW”) submits the following list of  
fact witnesses for the confirmation hearing.

**Witnesses:**

1. Laurie Stuart, UAW Local 2200, 5201 Woodward Avenue, Detroit, MI 48202

Subjects: (a) the history of participation of the employees, former employees and retirees of the Detroit Library Commission/Detroit Public Library (“Library”) from UAW-represented bargaining units in the General Retirement System of the City of Detroit (“GRS”) and the accrual, receipt and funding of pension and other post-employment benefits (“OPEB”) by and for such persons; (b) the status of the Library as a municipal corporation separate from the City of Detroit (“City”); and (c) the history of the negotiation of the current and predecessor collective bargaining agreements between the Library and the UAW, and the status of those agreements, including but not limited to the provisions of those agreements that relate to pensions and OPEB.

2. Jo Anne G. Mondowney, Executive Director, Detroit Public Library, 5201 Woodward Avenue, Detroit, MI 48202

Subjects: (a) the status of the Library as a municipal corporation separate from the City; (b) the status of pension benefits and OPEB for Library

employees, former employees and retirees from UAW-represented bargaining units; (c) what effect, if any, the Chapter 9 bankruptcy may have on the pension benefits and OPEB of Library employees, former employees and retirees; (d) the history of funding by the Library of pension benefits and OPEB for Library employees, former employees and retirees; (e) the history of participation of the Library's employees, former employees and retirees in the GRS and the accrual, receipt and funding of pensions and OPEB by and for such persons; (f) the history of the negotiation of the current and predecessor collective bargaining agreements between the Library and the UAW, and the status of those agreements, including but not limited to the provisions of those agreements that relate to pensions and OPEB; and (g) communications, and possible understandings or agreements, with other parties concerning pension and OPEB for employees, former employees and retirees of the Library.

3. Cynthia A. Thomas, Executive Director, General Retirement System of the City of Detroit, 2 Woodward Avenue, Detroit, MI 48226

Subjects: (a) what effect, if any, the Chapter 9 bankruptcy may have on the pension benefits of Library employees, former employees and retirees; (b) the history of participation of the Library's employees, former employees and retirees in the GRS and the accrual, receipt and funding of pensions by and for such persons; and (c) the amount of accrued pension liabilities attributable or allocable to GRS participants who are Library employees, former employees or retirees.

4. Michael J. VanOverbeke, VanOverbeke, Michaud & Timmony, P.C., 79 Alfred Street, Detroit, MI 48201

Subjects: Same as Thomas.

5. Evan Miller, Jones Day, 51 Louisiana Avenue, NW, Washington, DC 20001-2113

Subject: (a) Efforts, or lack thereof, of the City to negotiate financial relief outside of bankruptcy; and (b) communications, and possible understandings or agreements, with other parties concerning pension and OPEB for employees, former employees and retirees of the Library.

6. Jack Dietrich, UAW Local 2211, 2 Woodward Avenue, Detroit, MI 48226

Subject: (a) the March 2012 labor agreement between City and the coalition of labor unions; and (b) the July 2012 City Employment Terms.

The UAW reserves the right to add to or modify this list based either on information obtained in discovery or on subsequent developments related to the subjects listed above.

Dated: August 1, 2014

Respectfully submitted,

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### **CERTIFICATE OF SERVICE**

I certify that on this 1st day of August 2014, I caused the foregoing document to be served on counsel for the City of Detroit and for all other parties of record through the Court's CM/ECF system.

/s/ *Babette A. Ceccotti*

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